

**UNITED STATES BANKRUPTCY COURT  
FOR SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	<b>Case No. 18-32106</b>
<b>ERIN ENERGY CORPORATION, et al.,<sup>1</sup></b>	§	
	§	<b>(Chapter 7)</b>
<b>DEBTORS.</b>	§	
	§	<b>(Jointly Administered)</b>
	§	
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<b>RONALD J. SOMMERS, CHAPTER 7</b>	§	
<b>TRUSTEE FOR ERIN PETROLEUM</b>	§	
<b>NIGERIA Ltd.,</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	<b>Adversary No. 19-03667</b>
<b>v.</b>	§	
	§	
<b>NIGERIAN AGIP EXPLORATION</b>	§	
<b>LIMITED,</b>	§	
	§	
<b>Defendant.</b>	§	

**MOTION TO WITHDRAW TRUSTEE’S EXPEDITED MOTION FOR AN  
ORDER APPROVING THE METHOD OF SERVICE OF THE TRUSTEE’S  
COMPLAINT ON NIGERIAN AGIP EXPLORATION LIMITED  
[Relates to Docket No. 2]**

Ronald J. Sommers, chapter 7 trustee for Erin Petroleum Nigeria Ltd. and plaintiff in this adversary proceeding, seeks the Court’s permission to withdraw without prejudice his Expedited Motion for an Order Approving the Method of Service of the Trustee’s Complaint on Nigerian Agip Exploration Limited [Docket No. 2] (the “Motion”).

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<sup>1</sup> The last four digits of Erin Energy Corporation’s federal tax identification number are 9798. The other Debtors in these cases are: Erin Energy Limited; Erin Energy Kenya Limited; and Erin Petroleum Nigeria Limited (collectively with Erin Energy Corporation, “the Erin Debtors”). The Erin Debtors’ service address was: 1330 Post Oak Blvd., Suite 2250, Houston, TX 77056, but all correspondence regarding the Debtors should be addressed to the chapter 7 trustee Ronald J. Sommers, Nathan Sommers Jacobs, 2800 Post Oaks Blvd, #6100, Houston, Texas 77056.

WHEREFORE, the Trustee requests the entry of an order approving withdrawal of the Motion without prejudice and granting the Trustee such other and further relief as the Court deems just and proper.

Dated: December 11, 2019  
Houston, Texas

Respectfully submitted,

/s/ Elizabeth M. Guffy

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**ATTORNEYS FOR RONALD J.  
SOMMERS, CHAPTER 7 TRUSTEE  
FOR ERIN PETROLEUM NIGERIA  
Ltd.**

**Certificate of Service**

I hereby certify that on December 11, 2019, a true and correct copy of the foregoing was served electronically through the Court's ECF system on all parties registered for such service and by email at the following addresses on counsel who have previously appeared for Nigerian Agip Exploration Limited in the Erin Debtors' jointly administered bankruptcy cases:

Ronald J. Silverman – [ronald.silverman@hoganlovells.com](mailto:ronald.silverman@hoganlovells.com)

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/s/ Elizabeth M. Guffy  
Elizabeth M. Guffy